

October 10, 2022

Chair Tony Doan  
Washington State Building Code Council  
1500 Jefferson St SE  
Olympia, WA 98501

Chair Doan and Members of the State Building Code Council:

RE Sources urges the State Building Code Council (SBCC) to pass the full set of residential energy code proposals currently undergoing public comment. In particular, we strongly support the requirements for heat pump systems in new homes and stronger ventilation for kitchens with gas stoves to protect indoor air quality and respiratory health.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. RE Sources has thousands of supporters in Whatcom, Skagit and San Juan Counties, and we submit these comments on their behalf.

Washington has seen the direct impacts of climate change already. We now regularly experience drought, longer and worse wildfire seasons, droughts, and extreme summer heat waves — which have killed many residents, damaged infrastructure, and harmed wildlife. In the face of the climate emergency, it is critical that officials at all levels of government pass the policies needed to reduce emissions, protect our communities from further harm, and foster resilience. There is also a dire need for increased access to air conditioning. Heat pumps can provide this more efficiently than standard A/C units, helping prevent heat-related health impacts and allowing people to stay cool while shutting windows during wildfire smoke.

The set of proposals will make new homes far more energy-efficient and less reliant on fossil fuels. This is critical to “stop digging the hole deeper” for human health and the climate, since new homes generally lock in whatever fuel sources they utilize for decades to come.

As you’ve heard from many testifiers this code cycle, buildings are the fastest growing source of carbon emissions in Washington State, largely attributable to the use of fracked gas in homes and buildings. Under existing law, Washington’s energy code is required to become increasingly more efficient every revision cycle so that new buildings in 2031 are 70% more efficient than those built in 2006. Phasing out the use of gas appliances in homes and buildings is the most cost-effective and practical pathway to meeting this statutory deadline. There are only four code cycles between now and the 2031 target date. Each code revision should take bold steps to make buildings more efficient and transition away from fossil fuels. **Electric heat pump systems are far more efficient than fossil fuel furnaces and water heaters, and eliminate on-site fossil fuel combustion.**

Critics of the residential energy code proposals raise concerns about improved building standards raising the cost of housing while there is already a substantial housing shortage. Likewise, they suggest that the electrical grid will strain under the load of additional electric appliances replacing fossil gas. **SBCC’s**

**responsibility in this instance is to determine the best standard of construction for new homes and buildings, which we believe is reflected in the proposed codes. The other policy concerns raised by critics are best addressed through housing programs and utility regulation, not building code standards.** Electrical utilities, the Washington Utilities and Transportation Commission, and the Western Electrical Coordinating Council share responsibility for maintaining the reliability of our electrical grid. SBCC does not have the tools to address these policy concerns and it would be inappropriate to do so through building code standards.

We urge the SBCC to vote in favor of the full package of proposed residential code amendments, including heat pump and ventilation proposals. Thank you for your many months of work on these codes.

Sincerely,

Simon Vickery  
Climate and Energy Policy Manager  
RE Sources